

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STEVEN FLOYD, JOLENE FURDEK, AND  
JONATHAN RYAN, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,  
and APPLE INC., a California corporation,

Defendants.

Case No. 2:22-cv-01599-KKE

**DECLARATION OF JON DUGAN  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR COSTS AND  
ATTORNEYS' FEES**

1 I, Jon Dugan, declare as follows:

2 1. I am an attorney admitted to practice law in the District of Columbia and Virginia.  
3 I am a member in good standing of the District of Columbia and Virginia bars. This Court has  
4 granted me *pro hac vice* status for this matter. I submit this declaration in support of Defendants'  
5 Motion for Attorneys' Fees and Costs. I have personal knowledge of the facts set forth in this  
6 declaration and could testify competently to them if called upon to do so.

7 2. I am Of Counsel at the law firm Redgrave LLP ("Redgrave"), which focuses on  
8 Information Law, including eDiscovery, information governance, records and information  
9 management, and other discovery issues. Redgrave has extensive experience with discovery  
10 matters. In 2025, Chambers and Partners ranked Redgrave LLP at the highest level (Band 1) in  
11 its Global Guide for the E-Discovery and Information Governance category for the fifth  
12 consecutive year. Additional information regarding the Firm and its professionals may be found  
13 on the Firm's website, located at <https://www.redgravellp.com/>.

14 3. My practice at Redgrave focuses on representing clients in litigation and  
15 regulatory matters, including sophisticated antitrust class actions. I have seven years of practice  
16 experience, including a two-year clerkship for the Honorable Chief Judge Martin K. Reidinger of  
17 the United States District Court for the Western District of North Carolina. I previously worked  
18 as an Associate and as a Managing Associate at Sidley Austin LLP, where my practice was  
19 similar and focused on commercial litigations, regulatory inquiries, and other large-scale  
20 eDiscovery matters. I received my Juris Doctor *with honors* from the University of North  
21 Carolina School of Law in 2018 and graduated from James Madison University with a Bachelor  
22 of Arts degree in both Political Science and History in 2014.

23 4. I have represented Amazon.com, Inc. ("Amazon") in this case since July 2023. I  
24 previously represented Amazon in this case while employed as a Managing Associate at Sidley  
25 Austin. In October 2024, I left Sidley Austin to become Of Counsel at Redgrave. Thereafter,  
26 Amazon retained Redgrave in addition to Sidley Austin as counsel in this case to assist with  
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1 issues related to discovery, including negotiations, document preservation and collection, data  
2 work, document review, privilege logging, and productions.

3 5. I am familiar with this litigation and the fees and expenses incurred by Redgrave  
4 LLP in this litigation, including the fees and expenses incurred in connection with Defendants'  
5 Motion to Compel (Dkt. 104) and Defendants' Motion for Discovery Sanctions (Dkt. 152). Over  
6 the last year, I have personally expended time and resources related to the Motion to Compel and  
7 the Motion for Sanctions. The briefing on the Motion to Compel and the Motion for Sanctions  
8 often involved novel questions or interpretations of law, which required more time and attention  
9 than other, more routine briefing.

10 6. I kept time contemporaneously with tasks performed related to the Motion to  
11 Compel and the Motion for Sanctions. That includes time spent drafting briefs, researching law,  
12 reviewing Plaintiffs' filings, and attending hearings. In total, Redgrave incurred 12.5 hours and  
13 \$8,842 in total fees in connection with the Motion to Compel and the Motion for Sanctions. *See*  
14 Fanning Decl. ¶ 11 (stating that DWT's hourly rate for J. Dugan's time in 2024 would have been  
15 \$690 and \$760 in 2025).

16 7. The record of my time spent related to the tasks and activities for which Amazon  
17 seeks recovery is reflected in **Exhibit A**. Redgrave retains supporting documentation for such  
18 costs and expenses, which were tabulated in the ordinary course of business.

19 8. In my professional judgment and opinion, the time spent by Redgrave related to  
20 the Motion to Compel and the Motion for Sanctions was necessary and essential to litigating  
21 those disputes. I have carefully reviewed the time and costs incurred by Redgrave for which  
22 Amazon seeks reimbursement and confirm that the time and expenses were necessarily incurred.

23 9. In connection with this fee motion, Amazon is requesting an hourly rate for  
24 Redgrave LLP's lawyers based upon the rates regularly charged by Davis Wright Tremaine for  
25 work in this District. Fanning Decl. ¶¶ 11.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct.

3 Executed on this 2nd day of May, 2025, in Washington, D.C.

4 s/ Jon Dugan

5 Jon Dugan  
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# **Exhibit A**

| Worked Date | Timekeeper | Title      | Worked Hours<br>12.5 | Worked Amount<br>\$8,842.00 |
|-------------|------------|------------|----------------------|-----------------------------|
| 10/16/2024  | Dugan, Jon | Of Counsel | 0.6                  | \$414.00                    |
| 10/22/2024  | Dugan, Jon | Of Counsel | 0.5                  | \$345.00                    |
| 10/23/2024  | Dugan, Jon | Of Counsel | 0.5                  | \$345.00                    |
| 11/5/2024   | Dugan, Jon | Of Counsel | 2                    | \$1,380.00                  |
| 11/5/2024   | Dugan, Jon | Of Counsel | 0.3                  | \$207.00                    |
| 11/6/2024   | Dugan, Jon | Of Counsel | 0.5                  | \$345.00                    |
| 11/12/2024  | Dugan, Jon | Of Counsel | 0.4                  | \$276.00                    |
| 11/13/2024  | Dugan, Jon | Of Counsel | 2                    | \$1,380.00                  |
| 11/17/2024  | Dugan, Jon | Of Counsel | 0.40                 | \$276.00                    |
| 11/18/2024  | Dugan, Jon | Of Counsel | 0.60                 | \$414.00                    |
| 11/19/2024  | Dugan, Jon | Of Counsel | 0.30                 | \$207.00                    |
| 11/21/2024  | Dugan, Jon | Of Counsel | 0.50                 | \$345.00                    |
| 11/26/2024  | Dugan, Jon | Of Counsel | 0.30                 | \$207.00                    |
| 12/18/2024  | Dugan, Jon | Of Counsel | 0.50                 | \$345.00                    |
| 2/3/2025    | Dugan, Jon | Of Counsel | 0.60                 | \$456.00                    |
| 2/4/2025    | Dugan, Jon | Of Counsel | 0.60                 | \$456.00                    |
| 2/6/2025    | Dugan, Jon | Of Counsel | 0.80                 | \$608.00                    |
| 2/6/2025    | Dugan, Jon | Of Counsel | 0.40                 | \$304.00                    |
| 4/11/2025   | Dugan, Jon | Of Counsel | 0.70                 | \$532.00                    |